

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

EDMONDSON COMMUNITY  
ORGANIZATION, INC., *et al.*,

*Plaintiffs,*

v.

MAYOR AND CITY COUNCIL OF  
BALTIMORE, *et al.*,

*Defendants.*

No. 1:24-cv-01921-BAH

\* \* \* \* \*  
**STIPULATION TO EXTEND THE TIME FOR THE STATE OF MARYLAND  
TO INTERVENE**

Plaintiffs, the Edmondson Community Organization, Inc. and Bonita Anderson;  
Defendants, Mayor and City Council of Baltimore, Michael Mocksten, Tempest LLC and  
East Coast Tax Auctions, LLC; and the State of Maryland, by their undersigned counsel,  
file this Stipulation to Extend the Time for the State of Maryland in Intervene, and state:

1. Plaintiffs commenced this action by the filing of their complaint (ECF 1) on July 2, 2024. Plaintiffs filed their amended complaint (ECF 22) on October 1, 2024.
2. In accordance with Rule 5.1 of the Federal of the Federal Rules of Civil Procedure, on October 1, 2024, Plaintiffs filed their Rule 5.1 Notice of Constitutional Question (ECF 23) (the “Notice”) and served a copy of the Notice upon the State of Maryland (the “State”).

3. Pursuant to Rule 5.1, “[u]nless the court sets a later time, the attorney general may intervene within 60 days after the notice is filed or after the court certifies the [constitutional] challenge, whichever is earlier.”

4. At present, December 2, 2024 is the deadline by which the State may intervene in this matter.

5. The undersigned parties stipulate that the deadline for the State to intervene shall be extended to that date which is thirty (30) days from when the Court enters an order ruling on the motions to dismiss the Defendants expect to file in this matter.

WHEREFORE, the parties request that this Court enter an order approving this stipulation and providing that the deadline for the State to intervene shall be extended to that date which is thirty (30) days from when the Court enters an order ruling on Defendants’ motions to dismiss.

Respectfully submitted,

ANTHONY G. BROWN  
Attorney General of Maryland

/s/ Elchanan Engel, Esq.

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Attorneys for Mayor and City Council of  
Baltimore and Michael Mocksten

SO ORDERED:

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United States District Judge

**CERTIFICATE OF SERVICE**

I certify that, on this 25th day of November, 2024 the foregoing was served by CM/ECF on all registered CMF users and by first-class mail and email on the following:

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